

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUSAN CHODKOWSKI, GARY VOLPE,
MATTHEW SARTER, WENDY NEAL, DEBORAH
PEDENZIN, ROSANNA LAURO, DANIELLE
DAVIDSON, and all others similarly situated,

Plaintiffs,

No. 16-cv-5770 (GRB)

**DEFENDANT'S NOTICE OF
MOTION FOR SUMMARY
JUDGMENT**

-against-

COUNTY OF NASSAU

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Defendant's Rule 56.1 Statement Of Undisputed Material Facts; the annexed Declaration of Rhoda Y. Andors, dated May 20, 2020, and the exhibits annexed thereto; and the accompanying Memorandum Of Law In Support Of Defendant's Motion For Summary Judgment, dated May 19, 2020, and upon all other pleadings and proceedings heretofore had herein, Defendant, County of Nassau, ("Defendant") will move this Court, at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, before the Honorable Gary R. Brown, at a time and date to be determined by the Court, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Defendant complete summary judgment dismissing the complaint in its entirety on the grounds that there are no material facts requiring a trial and that as a matter of law, Defendant is entitled to judgment on all of Plaintiffs' claims in this action, and for such other and further relief as the Court deems just, proper, and equitable.

Dated: Mineola, New York
May 20, 2020

/s/ Rhoda Y. Andors

Rhoda Y. Andors
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